

**AMENDED**

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

**UNITED STATES DISTRICT COURT**

for the

Southern District of Texas

HOUSTON Division

DANA GLASCO

Case No. 4:20cv1884

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SEE ATTACHED 1

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

United States Courts  
Southern District of Texas  
FILED

JUN 10 2020

David J. Bradley, Clerk of Court

**COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	DANA GLASCO
Street Address	10300 HARWIN DR APT 406
City and County	HOUSTON
State and Zip Code	TEXAS 77036
Telephone Number	32330108099
E-mail Address	DANAGBHAM@GMAIL.COM

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	UNITED STATES DEPARTMENT OF JUSTICE
Job or Title <i>(if known)</i>	DRUG ENFORCEMENT ADMINISTRATION
Street Address	8701 MORRISSETTE DRIVE
City and County	SPRINGFIELD
State and Zip Code	VIRGINIA 22152-1080
Telephone Number	2023079362
E-mail Address <i>(if known)</i>	Wynn.M.Shuford@usdoj.gov

## Defendant No. 2

Name	UNITED STATES DEPARTMENT OF JUSTICE
Job or Title <i>(if known)</i>	FEDERAL BUREAU OF INVESTIGATIONS
Street Address	935 PENNSYLVANIA AVENUE NW
City and County	WASHINGTON DC
State and Zip Code	20535-0001
Telephone Number	2025142000
E-mail Address <i>(if known)</i>	Paul.R.Wellon@usdoj.gov

## Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

## Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

25 CFR § 11.401 - Recklessly endangering another person

25 CFR § 11.402 - Terroristic threats

18 USC Ch. 109 §2234- Authority exceeded in executing warrant

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* DANA GLASCO, is a citizen of the  
State of *(name)* TEXAS.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* \_\_\_\_\_, is incorporated  
under the laws of the State of *(name)* \_\_\_\_\_,  
and has its principal place of business in the State of *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, *(name)* \_\_\_\_\_, is a citizen of  
the State of *(name)* \_\_\_\_\_. Or is a citizen of  
*(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

SEE ATTACHMENT 2

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### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

SEE ATTACHMENT 2

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### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

SEE ATTACHMENT 2

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

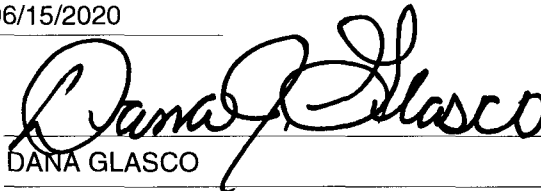
**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06/15/2020

Signature of Plaintiff

Printed Name of Plaintiff

  
DANA GLASCO**B. For Attorneys**

Date of signing:

6/15/2020

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

AMENDED

(ATTACHMENT 1)

DEFENDANT No. 1: UNITED STATES DEPARTMENT OF JUSTICE  
DRUG ENFORCEMENT ADMINISTRATION

DEFENDANT No. 2: UNITED STATES DEPARTMENT JUSTICE  
FEDERAL BUREAU OF INVESTIGATIONS

## ATTACHMENT 2

**3.** FROM NOVEMBER 2016 TO JUNE 2019 GOVERNMENT AGENTS ENGAGED IN CONDUCT RELATIVE TO STATUTES PROVIDED ON MULTIPLE OCCASIONS IN ATTEMPT TO SERVICE SEARCH WARRANT OF PERSON AND/OR PREMISES WHICH ENDANGERED MY SAFETY, CONSTITUTED TERRORISTIC THREATS, AND IN WHICH ACTIONS EXCEEDED THE AUTHORITY IN EXECUTING WARRANTS.

**III.** FROM NOVEMBER 2016 TO JUNE 2019 GOVERNMENT AGENTS ENGAGED IN CONDUCT RELATIVE TO STATUTES ON MULTIPLE OCCASIONS IN ATTEMPT TO SERVICE SEARCH WARRANT OF PERSON AND/OR PREMISES WHICH ENDANGERED MY SAFETY, CONSTITUTED TERRORIST THREATS, AND IN WHICH ACTIONS EXCEEDED THE AUTHORITY IN EXECUTING WARRANTS WHICH WERE ULTIMATELY NEVER SERVED. ON NOVEMBER 16, 2016 BETWEEN 3 AND 7 PM, AGENTS ENTERED MY APT WHEN I WASN'T HOME. OVER THE COURSE OF SUBSEQUENT MONTHS, THEY MADE SEVERAL ATTEMPTS TO EXECUTE A SURPRISE SEARCH, BUT I WAS AWARE OF THEIR PRESENCE. ON AT LEAST 3 OCCASIONS THEY GAINED ACCESS TO MY APARTMENT WHILE I WAS LAYING ON THE FLOOR TO COMPLY, BUT NEVER ENTERED AND I WAS NEVER MADE AWARE OF THE AGENCY FOR WHICH THEY WORKED OR THEIR IDENTITY. ON SEVERAL OCCASIONS I WAS THREATENED WITH THE RELEASE OF CANINES, EVEN AS I LAY IN SUBMISSION AND COMPLIANCE ON THE FLOOR OF MY APPARTMENT. FROM 2016 UP TO AS LATE AS MARCH 2020 THESE ATTEMPTS AND MY INTERACTIONS WITH THESE INDIVIDUALS WOULD TOTAL MORE THAN 30 INCIDENTS. ON MULTIPLE OCCASIONS, FEARING FOR MY SAFETY, I ACTUALLY CONTACTED LOCAL POLICE IN LOS ANGELES, CA. FROM NOVEMBER 2016 TO APRIL 2017, AND IN BIRMINGHAM, AL. ON JUNE 11 AND 12 OF 2018 JUST AS ASSURANCE FOR MY WELL BEING.

**IV.** THE DAMAGES I AM SEEKING ARE RELATIVE TO MENTAL AND EMOTIONAL DISTRESS IN THE AMOUNT OF \$200,000, WHICH WOULD INCLUDE CONTINUED MENTAL HEALTH COUNSELING AND TREATMENT THIS FIGURE IS BASED ON THE MULTIPLE INCIDENTS IN WHICH THESE ACTIONS AND BEHAVIORS WERE UNDERTAKEN, EVEN AFTER A FORMAL COMPLAINT WAS SUBMITTED TO THE US JUSTICE DEPARTMENT INSPECTOR GENERAL. I WOULD ALSO LIKE THE COURT TO CONSIDER PUNITIVE DAMAGES SINCE THESE ACTIONS MAY INVOLVE NEGLIGENCE ON BEHALF OF LEGAL AUTHORITIES.

DANA GLASCO

10300 HARWIN DR. APT. 406

HOUSTON, TX 77036

6/12/2020

CASE NUMBER: 4:20-cv-01884

I AM WRITING TO RESPECTFULLY REQUEST AN AMENDMENT TO MY COMPLAINT TO INCLUDE AN ADDITIONAL DEFENDANT IN MY CASE. AFTER CAREFUL ANALYSIS, I HAVE CONCLUDED THAT THIS ADDITIONAL DEFENDANT WAS A PARTY TO THE EVENTS WHICH LED ME TO FILE THE COMPLAINT WITH THE COURT AND SHOULD BE HELD LIABLE AS WELL. THIS DEFENDANT WILL ALSO BE ABLE TO PROVIDE PERTINENT INFORMATION THAT WOULD BE VITAL TO SUBSTANTIATING MY CLAIM.

RESPECTFULLY,

DANA J. GLASCO

A handwritten signature in black ink, appearing to read "Dana J. Glasco", with a stylized, flowing script.